

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

JEFFREY RABIEA, :
v. Plaintiff, :
FIRST NATIONAL BANK OF PENNSYLVANIA, :
Defendant. :
: CASE NO: 2:08-cv-00903

**DEFENDANT'S MOTION TO COMPEL COMPLETE
RESPONSES TO REQUESTS FOR ADMISSIONS**

Defendant First National Bank of Pennsylvania (“FNBPA”) hereby files this Motion to Compel Complete Responses to its First Set of Requests for Admissions directed to Plaintiff, Jeffrey Rabiea (“Rabiea”).

1. On August 12, 2009, FNBPA served its First Set of Requests for Admissions, Third Set of Interrogatories, and Fourth Set of Requests for Production of Documents (the “Requests for Admissions”) upon Rabiea.

2. In the Interrogatory and Request for Production accompanying its First Set of Requests for Admissions, FNBPA asked Mr. Rabiea, “[f]or each and every Request for Admission which you have denied, identify the specific grounds supporting the denial of the Requests and provide any and all documents supporting the denial of the Request.”

3. On October 15, 2009, Mr. Rabiea served responses to the Requests for Admissions. A true and correct copy of Mr. Rabiea’s Responses to FNBPA’s Requests for Admissions is attached to the Memorandum of Law in Support of this Motion as Exhibit A. In his responses, Mr. Rabiea refused to admit any of the Requests for Admissions.

4. Mr. Rabiea's Responses to FNBPA's Requests for Admissions fail to offer any specific support to support each of his denials, nor do they offer grounds to support his alleged inability to admit or deny certain Requests. Mr. Rabiea's deficient Responses are evasive, ambiguous, and nonspecific, and they fail to meet the requirements of the Federal Rules of Civil Procedure.

WHEREFORE, for reasons articulated more fully in the Memorandum of Law in Support of this Motion, filed contemporaneously herewith, FNBPA requests an order requiring Rabiea to file complete responses to FNBPA's First Requests for Admissions, Third Set of Interrogatories, and Fourth Set of Requests for Production of Documents.

Respectfully Submitted,

/s/ Paul D. Steinman, Esq.
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Dated: October 29, 2009

CERTIFICATE OF SERVICE

I, Paul D. Steinman, Esquire, hereby certify that on October 29, 2009, a true and correct copy of the foregoing Defendant's Motion to Compel Complete Responses to Requests for Admissions to be served upon the following counsel of record via the PACER/ECF system:

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